

TO: Ron Davis
 CC: Steve Mihalko
 FR: Ann Troutman
 RE: Oral Comments from 5/7, 5/28, 6/9, 6/25 Abex workshops
 DT: 7/21/92

* Removal comments are included only if they directly apply to the remedial

II. A. General Comments

Timing / Schedule
Comment:

Mr. Holland was curious if the sudden urge to jump forth with all the activity had anything to do with the Government putting in a multimillion dollar industrial center there.

Groundwater
Response:

No, the Superfund process began long before the announcement of the potential industrial center. Superfund is a lengthy study that began in 1989. Final study results were not available until February 1992.

Comment:

Several citizens expressed concern about the groundwater. One citizen stated that he uses well water for watering his garden.

Response:

We did detect slightly elevated lead levels in the groundwater at the site. The levels were 30 ppb of lead in the resolve phase and it was immediately downgradient of the Abex lot. This aquifer is not used for drinking or bathing. Residents in the area are on public water. EPA and VDWM staff spoke with the resident about his private well after the meeting.

Eat + transport
Comment:

Mr. Riddick Jr. asked if lead has a tendency to rise over a period of years.

Response:

(Please discuss the toxicity and mobility in the soil)

Admin Record
Comment:

Ms. Lovett asked if other information was available besides just the solution.

Response:

The Administrative Record contains all the information used to choose the alternative. For example, you can find sampling information on the groundwater and soil.

Comment:

Mr. Holland asked if there were any studies done on previous residents there?

Health studies
Response:

Other than blood screenings by the Portsmouth Health Department, no studies have been conducted to date. However, the agencies are trying to arrange study activities the Agency for Toxic Substance Disease Registry (ATSDR).

RI
Comment:

Ms. Lovett wanted to know who initially started the investigation EPA or Abex and what was the catalyst for this investigation.

Response:

Due to the nature of the operation and a concern about the contents in the lot EPA conducted a preliminary assessment of the site.

Health investigation
Comment:

Ms. Lovett also asked if there were there any complaints about health problems at that time.

Response:

No.

Enforcement
Comment:

Mr. Holland asked when the agencies notified Abex that they were going to be investigated.

Enforcement
Response: EPA notified Abex in mid-1980s that there was a problem.

Comment: Mr. Holland was angry that Abex knew about the problem and still sold him the building.

Enforcement
Response:

Comment: Mr. Holland asked if there is a possibility that any of the latest contamination could have come from the houses and buildings that have been demolished over the last 20 years (those that were constantly painted with lead paint).

Other Contaminants
Response: Yes, it is possible. There are areas where we found high lead that we could not tie to Abex.

Comment: Ms. Lovett asked if there are any other kinds of material besides lead that they should be aware of.

Earlier Removal
Response: There are some extremely low levels of PCBs in and around the foundry that are not high enough to be of concern.

Comment: Mr. Riddick Jr. asked what prompted the EPA to stop when they were cleaning the site the first time.

Removal access letter
Response:

Comment: Many citizens were confused about the access letter received without explanation.

Response: EPA officials clarified the notice with residents after the meeting.

gate + transport
Comment: Much concern was expressed at the May 28, 1992, workshop about the flooding when it rains carrying lead down the street.

Health effects
Response:

Comment: Many questions and concerns arose at all four workshops about the health effects of lead on children, pregnant women, and adults.

✓ a. What does it do to children under six?

Response:

✓ b. How can I prevent my child from getting contaminated?

Response:

✓ c. Is it harmful to an adult?

Response:

✓ d. One resident pointed out that conventional washing of vegetables did not get rid of the lead

Response:

✓ e. If the residents haven't been tested how can you accurately say that we or our children haven't suffered from lead poisoning?

Response: That is correct. A blood test will confirm the level of lead in the blood.

- ✓ f. Concern was expressed by several residents about the services and cost of blood screenings at the Portsmouth Health Department.

Response: The Portsmouth Health Department draws the blood and sends it to Norfolk for analysis. In this case, free screenings were offered to residents. Three screening days were held in the Washington Park Community Center. The blood will be tested in Richmond at the state lab.

- ✓ g. What symptoms should a parent look for in his or her child?

Response:

- ✓ h. After age six does the child start growing out of the lead?

Response:

- ✓ i. What happens when lead is in the bone of a child or adult?

Response:

- ✓ j. A resident asked if the lead could have effected him as a child and his mother just didn't notice.

Response: Yes, it is possible. The toxicologist at the June 9, 1992 workshop felt that just by observing him he didn't think he was effected.

- k. Was the blood test that was done years ago accurate? (In reference to CDC levels)

Response:

- ✓ l. What would happen to an individual that receives steady exposure for 33 years?

Response: All of us receive a steady exposure through a variety of sources in our society. It is difficult to say specifically because of individual mechanisms. There are certain kinds of behaviors that can contribute to a person becoming lead poisoned.

- ✓ m. Could a person have a high lead level, higher than normal and go on with his life?

Response: Experts would not be able to tell unless the individual was tested.

- ✓ n. Does a high lead level cause permanent damage?

Response:

- ✓ o. Have there been any studies conducted on the physical health problems caused by lead exposure?

Response:

- ✓ p. One resident claim that his doctor said that once lead get inside the body you can't get rid of it and that's why it is a big problem.

Response: Most of the lead gets thrown out of the body over time

- ✓ q. How does lead in the bone affect the rest of the body? Could the bone become deformed?

Response:

- ✓ r. Several residents said that many of their family members and friends have moved out of the neighborhood. Would they be eligible for testing?

Response: Yes. Free blood lead screening is being offered by the Portsmouth Health Department. Individuals out of the area may also consult their personal physician.

- ✓ s. Why be tested if the lead exposure doesn't pose any type of threat?

Response: The screenings were made available because citizens requested it.

- ✓ t. How do you know that a child's cognitive development or either physical development could be directly associated with lead?

Response: (tox.-Expand upon the research done by Needleman and Dellinger)

- ✓ u. What are the ways that lead can enter the body and cause damage?

Response: (tox.- stress pt. that dirt on skin will not cause problems, etc.)

- v. One resident asked if there is anyway that the agencies can do testing on the men in jail. Their behavior problems might have something to do with past lead exposure.

Response:

- ✓ w. Some residents believe that lead contamination can be inherited.

Response:

- x. One citizen at the June 25, 1992 meeting equated the effects of lead with crack or cocaine.

Response:

Comment: One citizen asked if it was true that the groundwater was the reason why the soil became contaminated.

Response:

Comment: One woman's yard had four feet of fill brought in years ago. She asked if it (lead) worked its way up through the soil and tested positive, then what is to say that it isn't just going to work its way up again.

Response:

warning signs ✓ Comment: One citizen wanted to know if any warning signs were up.

Response: No, there is no formal requirement to place signage unless deemed necessary by the agencies. Signs were placed by the Removal Team for the Summer 1992 removal, per citizen request.

0 ✓ Comment: Several residents asked for a 100% guarantee that their soil would be free of lead after the cleanup.

Response: You will be given a guarantee that it is below the risk level.

✓ Comment: Many citizens expressed concern about decreasing property values.

Response:

✓ Comment: Citizens asked to be compensated monetarily so that they can rebuild somewhere else. (unanimous--applause from the group)

Response:

~~Comment: Avis Riddick requested organizational charts from the VDWM and EPA.~~

Response: VDWM forwarded the chart. EPA will forward one upon completion.

fake/transport Comment: A citizen was concerned that when the work is being conducted the rain would reinfect the area.

Response:

extent of action Comment: The commenter asked if soil would be removed under bricks.

Response: If there are loose bricks, that could be done.

11 Comment: It was also asked what would happen with swimming pools and decks.

Response:

Enforcement Comment: One citizen asked if EPA had determined who was responsible for the contamination.

Response:

Enforcement Comment: Avis Riddick requested a copy of a document which states citizens' rights. She also requested that the State and City receive copies.

Response: EPA agreed to provide this information.

foundations Comment: It takes 600 years for the earth to become stable after you disturb it. Residents are concerned specifically about the soils surrounding the house foundations.

Response:

P.E. Comment: It was asked if there would be a professional engineer on-site during the cleanup.

Response:

foundations Comment: Concern was voiced about the stability of homes due to the type of soil.

Response:

removal ✓ Comment: Why is it called an emergency if it is not an emergency?

Response: It is not an emergency. It is the legal designation under what they call the National Contingency Plan, or NCP. In order to get the funding, they have to use the language that the law provides.

notification Comment: Citizens felt that a posted warning should be up for those that aren't on the mailing list, and don't read a newspaper or watch television. Who's responsibility is it to post those signs, EPA or VDWM?

Respond:

NPL sites Comment: A resident wanted to know if it's possible to find out other Portsmouth NPL and those sites out of the state. How long has Portsmouth been on the list?

Respond: EPA agreed to provide this information. _____ (part two)

health studies ✓ Comment: Citizens asked if EPA investigates where there is a lead poisoning.

Respond:

BPAS treatment Comment: Residents suggested that they be bought out and that the site be cleaned up. Citizens at the June 25, 1992, workshop pointed out that a community in Texas was bought out and their children's education will be paid for.

Response:

✓ Comment: One resident asked if the EPA and VDWM thoroughly considered the ethical and stress related factors, when deciding on a clean up proposal.

Response: Several weeks of meetings were held to discuss the Site issues.

✓ Comment: At the June 9, 1992 workshop citizens inquired if any decisions had been made about buying the properties

Response: This item was discussed with EPA and VDWM management. At this date, no decisions had been made.

✓ Comment: A citizen asked if the interior of the home would be sampled?

Response:

hate/hangover Comment: It was pointed out again at the June 9, 1992, meeting that when it would rain, water would stand in several places. In addition, it would drain down the streets from the foundry.

Response:

✓ Comment: Many residents felt it is unfair that they were not told about the problem when they purchased or built their homes.

Response:

dust
Comment: One citizen mentioned that he understands that they would be getting any of the dust since the lot was capped in 1988. But, it was wide open up until that time.

Response:

lead in drinking water
Comment: Could the lead get into our water system? Several citizens were concerned about their drinking water even though they are not on wells.

Response:

cutting grass
✓ Comment: One resident is concerned about the exposure caused by cutting the grass. If the soil is contaminated, and the grass grows from that soil, then people cut the grass. So, you would be exposed.

Response:

✓ Comment: Citizens expressed very clearly at the June 25, 1992 workshop that they will to be evacuated, relocated, and compensated.

Response:

✓ Comment: One citizen at the June 25, 1992, workshop claims that the drinking water is contaminated.

Response:

rent
Comment: Several people were angry that the City was still collecting rent from residents in Washington Park.

Response: A city Housing official agreed to meet with residents any time.

Comment: Housing project residents were angry that they had no say, only city housing officials did.

Response: A city housing official agreed to meet with them at any time.

site history
Comment: How long has the lead been here from Abex?

Response: Foundry operations were conducted from 1928 - 1978.

health
✓ Comment: One citizen referred to teratogen effects and asked if there was a registry.

Response: (tox.-please clarify the terminology)

risk assessment
✓ Comment: Two residents at the June 25, 1992, meeting were confused about the meaning of upper bound cancer which was referenced in an EPA memo.

Response: It is a risk range. It is a statistical range that we use to determine the risk to the most

sensitive part of the population. This range is set up to make sure that people in the community that are effected are protected. Upper bound level means that they were at safe levels.

Comment: A resident asked if there was a video of a cleanup?

Response: EPA is looking into obtaining a video to show to residents.

health ✓ Comment: Citizens requested a mental health team to come in to assist residents.

Response: This request has been made to ATSDR.

lead in ✓ Comment: One citizen as if there are higher levels of lead in the air at any one time.

Response: The amount of anything in the air is going to fluctuate from day to day. It is possible that on a given day there might be more particles of lead or anything else in the air than there is on any other day.

II. B. Comments on Proposed Plan

bdg. Comment: Mr. Holland expressed his concern about the poor condition of the building. He felt the 100 year old building could easily fall.

Response:

capping Comment: Mr. Homsy, Abex's legal representation asked why capping was not an appropriate remedy.

Response: It is not a permanent remedy. Capping the area would require maintenance forever. It could also prevent further development of the area.

Admin Record Comment: Mr. Homsy, (Abex) asked that the agencies identify the documents upon which the remedy was selected.

Response: All those items placed in the Administrative Record are used to make the decision. Please refer to the index of the Administrative Record in Appendix ____.

R1 Comment: Several residents asked how the boundaries of the study area were set

Response:

Cleanup level Comment: Mr. Homsy asked if there was anything in the administrative record which would describe the exposure scenario which would pose a risk for lead that you indicated was at depth which justifies the remedy that you have proposed here other than the risk assessment submitted with the Remedial Investigation/Feasibility Study.

Response: The Proposed Plan identifies references that would relate to this concern. In particular, the references to the possibility of soil at depth being brought to the surface during other

intrusive activities such as gardening.

R1

Comment: Mr. Riddick Jr. asked how the sampling was conducted.

Response: The site was sampled on a 100 foot grid. Every 100 feet they took a sample.

R1

Comment: Mr. Riddick Jr. wanted to know who actually does the study.

Response: Abex hired a contractor, Geo Engineering. EPA and VDWM officials must approve all activities conducted. The agencies oversee the contractor's work.

Comment: Ms. Lovett asked if testing went out of the circle and if we plan on doing more testing outside of the circle.

Response: There was some testing done outside. An operable unit II is being planned to expand the study area.

Comment: Mr. Tyrone Riddick asked if property values would change and if the banks would have record of this.

Response: The intent of the cleanup is to restore the area. Property values would be expected to return to the appropriate level for the area. We are unable to speak for the banks.

Comment: Mr. Riddick Jr. asked about the proposal for homes with crawl spaces.

Response: Crawl space sampling has been conducted as a result of this initial comment and those expressed by other citizens at a later date.

Comment: Tyrone Riddick asked why his backyard was not tested.

Response:

Comment: One citizen asked if this process of removing contaminated soil had been done before by the agencies including dealing with the soil underneath the home.

Response:

Comment: One resident asked if we would proceed with something if it conflicts with what they are asking for.

Response: Public acceptance is one of the nine criteria that is considered when making a cleanup decision. The agencies will decide on a remedy which best meets these criteria.

Comment: One resident asked at what level would capping would be required.

Response: Capping is not being considered as an alternative because it is not a permanent solution.

Comment: A resident asked what would happen if all the alternatives were refused.

Response: If a new alternative is chosen, a public notice would appear in the local newspaper and a public comment period would be held.

Extent of
Sampling

Compensation

Crawl
Space

Extent of
Sampling

Excavation
at other sites

Public
input

Capping

ROD process

CONFIDENTIAL

Exposure
at other sites

Comment: Is there any lead site that is more advanced than this one? What did they do? Were the homes on slabs?

Response: (Smelterville Idaho example)

fate/transport

Comment: A resident wanted to know how contamination got down to four to five feet when the agencies say that lead doesn't move. What would prevent it from going deeper?

Response: All the foundry sands were stored in that area, similar to a landfill.
(provide part two of question)

extent of
cleanup

Comment: Citizens asked for a guarantee that if the decision is to dig deeper that they could dig all they want in their gardens, etc.

Response:

on-site
treatment

Comment: Residents expressed concern about the adverse effects that may be caused by the close proximity of on-site treatment.

Response:

II. C. Cost, Funding, and Schedule

Enforcement

Comment: Mr. Holland asked who is footing the bill?

Response: Pneumo Abex paid for the 1986 removal action, the Remedial Investigation/Feasibility Study, and the Summer 1992 removal action. Negotiations will be held with PRP(s) for the Remedial Design/Remedial Action phase of the cleanup.

Enforcement

Comment: Mr. Holland doesn't feel that he is responsible for something that happened 100 years ago.

Response: EPA and VDWM understand his frustration. Typically, a PRP is a past or present owner or operator of the site. However, it is not the intention of Superfund to bankrupt owners or seek funds from those that did not participate in the activity.

Enforcement

Comment: Mr. Holland is very concerned about his liability.

Response: EPA and VDWM discussed this issue with him after the 5/28 meeting. VDWM staff referred any additional request regarding this issue to EPA, per his request at a later date.

✓ **Comment:** Mr. Riddick Jr. inquired about the possibility of taking the \$16 million and buying out the residents.

Response: Superfund's purpose is to provide a permanent remedy. Typically, Superfund does not buy out residents.

✓ **Comment:** Ms. Lovett wanted to know what was the time delay between the 1980s to 1990s.

Response: A time line of technical activities is located in Appendix _____. (Steve, please provide)

Comment: Mr. Riddick Jr. asked how much the alternative would cost.

Response: Approximately \$16 million.

Extent of
Cleanup

Comment: A citizen is concerned that the process will continue forever. It was cleaned up in 1986-1989, and you're going through it again. Will it ever stop?

Response: The activity will stop when the area completes the clean up measures and follow up testing and monitoring.

Risk

Comment: One resident couldn't understand why there is a need to be inconvenienced if she and her family are not at risk.

Response: The cleanup will remove the risk for future generations that may settle in the area.

II. D. Public Participation

Comment: Mr. Holland was frustrated that his correspondence was not responded to satisfactorily.

Response: EPA extended an invitation to discuss this after the 5/28 meeting.

✓ Comment: Several citizens inquired why they were notified so late of the site activities.

Response: Information has been disseminated through a variety of media since 1990. Please refer to the chronology of community relations activities in Appendix ____.

CRP

Comment: Citizens requested that the Community Relations Plan be revised in order to accurately reflect the concerns of the citizens.

Response: The document is required to be evaluated prior to Remedial Design/Remedial Action. The determination is made whether or not it needs to be revised. A revision of the Plan will be conducted. Community Interviews will be scheduled after the issuance of the Record of Decision.

✓ Comment: Residents complained that they were not placed on the mailing list until recently.

Response: The agencies agreed to rectify the situation to insure that all interested parties are included. Blanket notification is usually not conducted due to its poor response rate.

TAG

Comment: Technical Assistance Grant (TAG) information was requested.

Response: VDWM provided the interested parties with a TAG package.

Public
Notice

Comment: One resident asked if EPA has any control over where notices are placed.

Response: EPA and DWM will place the ads in the editorial section of the Virginian Pilot.

II. E. Enforcement and Regulatory Issues

Comment: Ms. Lovett asked when does EPA and VDWM's responsibility end.

Response:

After the Remedial Action is complete the site will be reviewed and possible monitored for five years.